



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

SEP 26 2013

Antietam National Battlefield  
c/o Superintendent  
P. O. Box 158  
Sharpsburg, MD 21782

Monocacy National Battlefield  
c/o Superintendent  
4632 Araby Church Road  
Frederick, MD 21704

Manassas National Battlefield Park  
c/o Superintendent Ed. W. Clark  
12521 Lee Highway  
Manassas, VA 20109-2005

Re: Draft White-tailed Deer Management Plan and Environmental Impact Statement  
Antietam National Battlefield, MD; Monocacy National Battlefield, MD; Manassas National  
Battlefield, VA Spring 2013, CEQ 20130217

Dear Superintendents:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (EPA) has reviewed the subject document. The purpose of the Draft Environmental Impact Statement (DEIS) is to develop a deer management plan that supports protection, preservation, and restoration of native vegetation and other natural and cultural resources throughout Antietam, Monocacy, and Manassas National Battlefields. The purpose of the DEIS is also to provide appropriate response to chronic wasting disease at the Battlefields. The DEIS states that there are an estimated 129 deer per square mile at Antietam, 142 deer per square mile at Monocacy, and 190 deer per square mile at Manassas. The desired deer density goal at the Battlefield is 15-20 deer per square mile.

The preferred alternative is Alternative D, Combined Lethal and Nonlethal Deer Management. Initially this alternative would use lethal reductions via sharpshooters and capture/euthanasia to quickly reduce the deer population and achieve the initial deer density goal. Population maintenance would be conducted via reproductive control when an acceptable agent becomes available. Until an acceptable and effective reproductive control agent becomes available, population maintenance would be conducted using lethal methods. This alternative also includes an Adaptive Management Plan to assess conditions at the Battlefields and modify the actions accordingly.



Based on our review we rate this DEIS, Lack of Objections (LO). A description of our rating system can be found at <http://www.epa.gov/compliance/nepa/comments/ratings.html>. Thank you for the opportunity to offer these comments. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

